

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: AMERICAN MEDICAL  
COLLECTION AGENCY, INC.  
CUSTOMER  
DATA SECURITY BREACH  
LITIGATION

*This Document Relates To: All Actions*

Civil Action No. 19-md-2904  
(MCA)(MAH)

MDL 2904

**[PROPOSED] AMENDED  
CONSOLIDATED  
SCHEDULING ORDER**

WHEREAS, on August 7, 2024, the Court held a telephone conference where the parties discussed the timing of class certification;

WHEREAS, on August 7, 2024, the Court entered an Order (ECF 716), requiring the parties to meet and confer, and by August 30, 2024, submit a jointly proposed scheduling order for the completion of briefing and related expert discovery for class certification;

WHEREAS, the parties agree that the deadlines specified in the proposed schedule below are reasonable and appropriate; and

Good cause appearing,

IT IS this \_\_\_\_\_ day of \_\_\_\_\_, 2024,

ORDERED that the following are the operative deadlines for the events set forth below:

\_\_\_\_\_  
MICHAEL A. HAMMER, U.S.M.J.

<b>Event</b>	<b>Date</b>
Plaintiffs to serve motions for class certification and any expert reports in support of class certification	November 1, 2024
Plaintiffs to make any experts available for deposition, unless defendants agree to a later date	December 2, 2024
Defendants to serve briefs in opposition to class certification and any expert reports in opposition to class certification	January 30, 2025
Defendants to make any experts available for deposition, unless plaintiffs agree to a later date	March 3, 2025
Plaintiffs to serve reply briefs in support of class certification and any rebuttal expert reports in support of class certification	March 21, 2025
Parties to serve any motions challenging class certification experts	April 7, 2025
Parties to serve briefs in opposition to motions challenging class certification experts	April 28, 2025
Parties to serve reply briefs in support of motions challenging class certification experts	May 12, 2025